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Attorneys for Defendants  
SERVICENOW, INC. AND THE BOARD OF  
DIRECTORS OF SERVICENOW, INC.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

PAUL S. RUBKE and SHERIDA DU LAC DE  
FUGERES, individually and as representatives  
of a Class of Participants and Beneficiaries of  
the ServiceNow, Inc. 401(k) Plan,

Plaintiffs,

v.

SERVICENOW, INC. and  
BOARD OF DIRECTORS OF  
SERVICENOW, INC.,

Defendants.

Case No. 3:24-cv-01050-TLT (PHK)

**JOINT ADMINISTRATIVE MOTION TO  
STAY CASE TO ALLOW PLAINTIFFS  
TO FILE MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT**

Second Am. Compl. Filed: November 8, 2024

Hearing Date: N/A

Judge: Trina L. Thompson

Pursuant to Local Rule 7-11 and 7-12, and this Court's Standing Order for Civil Cases, Plaintiffs Paul S. Rubke and Sherida Du Lac De Fugeres ("Plaintiffs"), individually and as representatives of a putative class of participants and beneficiaries of the ServiceNow, Inc. 401(k) Plan ("Plan"), and Defendants ServiceNow, Inc. and the Board of Directors of ServiceNow, Inc. ("Defendants") (collectively, the "Parties"), through their undersigned counsel, respectfully ask this Court to stay this matter in its entirety and vacate all current case deadlines to allow Plaintiffs to file a motion for preliminary approval of a settlement in this matter.

After extensive, arms-length negotiations, the Parties have now reached a settlement in principle to resolve this litigation. The proposed terms of the settlement are based on the Parties' discovery to date and comprehensive negotiations. The Parties will draft a class action settlement agreement over the next several weeks, and Plaintiffs intend to file a motion for preliminary approval of the class action settlement no later than July 21, 2025.

The Parties ask that the Court stay this matter and vacate all deadlines in this case, including the upcoming June 6, 2025, deadlines for Plaintiffs to file a motion for class certification and for Defendants to file an answer to the Second Amended Complaint. A stay of the proceedings will help the Parties avoid unnecessarily expending time and resources litigating this matter while simultaneously preparing the anticipated settlement filings. For these reasons, the Parties request that the Court stay this matter in its entirety and vacate all pending deadlines so that the Parties can focus their efforts on finalizing the terms of settlement. *See, e.g.,* Order, *Madani v. Cnty. of Santa Clara*, Case No. 5:16-cv-07026-LHK (N.D. Cal. Sept. 17, 2018), Dkt. No. 94 (granting temporary stay to allow the parties to finalize the settlement following Board approval).

**DATED: JUNE 3, 2025**

WALCHESKE & LUZI, LLC

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**RESPECTFULLY SUBMITTED,**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 3, 2025, the foregoing Joint Administrative Motion was filed via the Court's CM/ECF system, which will send notification to all counsel of record.

/s/ Paul M. Secunda  
Paul M. Secunda